

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ELIZABETH DE COSTER, *et al.*, on behalf of  
themselves and all other similarly situated,

Plaintiffs,

AMAZON.COM, INC., a Delaware corporation,

Defendant.

DEBORAH FRAME-WILSON, *et al.*, on behalf of themselves and all other similarly situated,

Plaintiffs,

AMAZON.COM, INC., a Delaware corporation

## Definitions

CHRISTOPHER BROWN, *et al.*, on behalf of  
themselves and all others similarly situated

## Plaintiffs

AMAZON.COM, INC., a Delaware corporation.

Defendant

No. 2:21-cv-00693-JHC

**STIPULATED MOTION AND ORDER  
REGARDING SEALING OF MOTION TO  
COMPEL BRIEFING**

## **NOTE ON MOTION CALENDAR:**

August 19, 2024

No. 2:20-cv-00424-JHC

No. 2:22-cv-00965-JHC

1 The Parties have met and conferred with respect to the upcoming briefing on Plaintiffs' 2 Motion to Compel, and anticipate that their briefs, declarations, and exhibits will quote from 3 and/or describe in detail a significant amount of information that has been designated as 4 Confidential or Highly Confidential-Attorneys' Eyes Only by Amazon. Accordingly, in order to 5 ensure that such materials are treated appropriately under the applicable protective order, and to 6 reduce burdens on the Court, the Parties, pursuant to LCR 7(d)(1) and 10(g), and their respective 7 counsel, hereby stipulate and agree to the following procedure for filing and sealing in 8 connection with the motion to compel briefing, subject to the Court's approval.

9 1. Pursuant to LCR 5(g)(2), each Party will provisionally file under seal its briefs 10 (including any opening, response, and reply briefs), declarations, exhibits, and all other evidence 11 and declarations on which that Party relies (collectively, "Motion to Compel Papers") which 12 contain material designated Confidential or Highly Confidential-Attorneys' Eyes Only by 13 Amazon.

14 2. Within two weeks of the filing of Plaintiffs' reply brief, pursuant to LCR 5(g), the 15 Parties will meet and confer and, as appropriate, file (1) public versions of their Motion to 16 Compel Papers, with necessary redactions, and (2) corresponding motion(s) to seal pursuant to 17 LCR 5(g)(3). The Party seeking to maintain material under seal (or under redaction) shall be the 18 movant for purposes of any such motion(s) to seal associated with the Parties' Motion to Compel 19 Papers.

20 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

1 DATED August 19, 2024.

Respectfully submitted,

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STIP. MOT. & ORDER RE SEALING OF MTN. TO COMPEL BRIEFING

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15 *Attorneys for Defendant Amazon.com, Inc.*  
16

1 IT IS SO ORDERED.

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3 August 19, 2024

4 Dated



John H. Chun  
United States District Judge

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